

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

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In the Matter of

Advanced Television Systems
and Their Impact on the
Existing Television Broadcast
Service

Review of Technical and
Operational Requirements:
Part 73-E, Television Broadcast
Stations

Reevaluation of the UHF Television
Channel and Distance Separation
Requirements of Part 73 of the
Commission's Rules

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Federal Communications Commission
Office of the Secretary

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To: The Commission

COMMENTS ON NOTICE OF INQUIRY

Fisher Broadcasting Inc. ("Fisher Broadcasting"), by its attorneys, hereby comments on the Notice of Inquiry released on August 20, 1987 in the above-captioned proceeding.

1. Fisher Broadcasting is very pleased that the Commission, through its Notice of Inquiry, and other related actions, has recognized that local, free and universal television service is at an "historic crossroads" with the advent of Advanced Television ("ATV") technology. The viewing public has become very sophisticated and selective, not only in the quality of programming they will watch but also in the picture and sound quality of the transmission media in their home. Consumers have a multitude of transmission options available to them, everything from traditional free, over-the-air television to cable

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television, LPTV, SMATV and home satellite dishes. VCR penetration is growing at a very fast rate. DBS is also on the horizon. Traditional television must be in a position to be responsive to the public's demand for higher quality video and audio performance. If local television does not meet that challenge, there is a significant risk that this touchstone of universal broadcast service will be lost.

2. Some sixty years ago, Fisher Broadcasting began as a local broadcaster when KOMO(AM), Seattle, Washington went on the air in 1926. The company expanded its local service in 1953 with KOMO-TV (Channel 4), Seattle and later with KATU(TV) (Channel 4), Portland, Oregon. From the beginning, Fisher Broadcasting has regarded its licensee public interest duty as involving two aspects -- programming in a responsive way and transmitting to as many people as possible a reliable high quality video and audio signal. Throughout the decades of its broadcast ownership, Fisher Broadcasting has expended tens of millions of dollars in an effort to make sure that its transmission facilities reflect the highest possible state of the art. Indeed, that is why Fisher Broadcasting is in the process of seeking to raise its KOMO-TV tower and antenna in Seattle.

3. In promoting a marketplace environment, the FCC has expected broadcast licensees to respond to the dynamics of the deregulated marketplace. Fisher Broadcasting is eager to continue to compete vigorously to remain a Seattle and Portland cornerstone for universal television news, public service and entertainment programming. Its long standing partnership with

Capital Cities/ABC Inc. well illustrates that commitment and success. Fisher Broadcasting has maintained its marketplace excellence through its commitments to programming and signal quality. The two objectives go hand in hand -- insuring the best possible and most dependable reception of superior programming.

4. However, individual licensees like Fisher Broadcasting are powerless to unilaterally achieve the dramatic enhancement in picture quality represented by ATV, particularly if such systems are to be compatible with existing transmission and reception systems. ATV is a national opportunity uniquely requiring a national plan and unified federal action. Thus, Fisher Broadcasting is delighted that the Commission has accepted the responsibility of being the point organization to make sure that ATV is achieved as quickly as possible, that the quality of ATV available to broadcasters is competitive with non-broadcast video media and that the ATV system or systems to be developed are compatible with existing transmission facilities and receivers to the extent possible. The issuance of the Notice of Inquiry is an excellent beginning. The Commission's decision to place a temporary freeze on the assignment of certain frequencies in certain major markets and the appointment of a blue ribbon advisory panel are further tangible steps in this direction. Many segments of the broadcast industry have now begun to rally around this Commission led undertaking. The chief among them are the NAB and MST. They are filing extensive comments in response to the Notice of Inquiry and Fisher Broadcasting supports their comments.

5. Fisher Broadcasting is committed to working with these groups and cooperating with the Commission in its pursuit of a national plan for the development of ATV. On the local front, Fisher Broadcasting will continue to position itself in the marketplace to make the benefits of ATV available to its viewers as soon as ATV becomes a reality.

Based on the foregoing, Fisher Broadcasting compliments the Commission for its recognition of the critical importance of ATV to the future of universal television, for its actions to keep the spectrum options open for ATV and for its willingness to move ahead as quickly as possible, on a complete record, to develop a national ATV plan which relies upon existing television transmission and reception capabilities to the extent possible.

Respectfully submitted,
FISHER BROADCASTING INC.

By 

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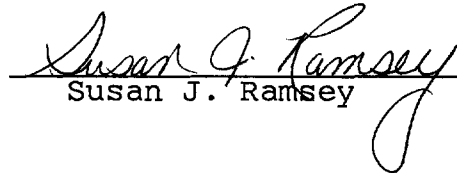
Dated: November 18, 1987

CERTIFICATE OF SERVICE

I, Susan J. Ramsey, hereby certify that I have this 18th day of November, 1987, mailed by first class United States mail, postage prepaid, copies of the foregoing to the following:

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